

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (SN)
ECF Case

This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN) (and member case *Betru, et al. v. Islamic Republic of Iran*, 18-cv-8297)

JAMES P. KREINDLER, Esq., hereby states under penalty of perjury that:

1. I am an attorney representing the *Ashton* and *Betru* plaintiffs in the above-captioned litigation and I submit this declaration in support of the motion for final judgment on behalf of the individual plaintiffs listed in the exhibit attached hereto as Exhibit A, and for permission to allow any remaining plaintiffs to move for the same relief in separate stages.

2. The source of my information and the basis for my belief in my statements contained herein is my personal involvement in this matter for the past 16 years; my firm's representation of the plaintiffs listed in Exhibit A in connection with the September 11th litigation; communications directly from family members of the individuals killed in the attacks on September 11th and the plaintiffs listed in Exhibit A; and other court records relating to the multi-district litigation to which the *Ashton* and *Betru* plaintiffs are parties. Any matters about which I lack personal knowledge are asserted herein upon information and belief.

3. All of the decedents listed in Exhibit A died in the September 11th terrorist attacks and are survived by the family members whose relationships to the decedents are described in Exhibit A. These relationships have been personally verified by staff members in my office who have obtained written documentation and/or conducted interviews confirming the relationships.

4. To minimize the chance of any human error, my firm has instituted a further level

of quality control, during which an additional attorney has reviewed all case files and corroborated that the relationship is as stated in Exhibit A and that the claimants all survived the deaths of their loved ones on September 11, 2001.

5. We have been retained individually by the plaintiffs listed in Exhibit A to pursue recovery for their solatium losses arising out of the deaths of their loved ones on September 11, 2001. The *Ashton* plaintiffs have previously been awarded a final default judgment on liability against Iran in relation to the September 11, 2001 Terror Attack. We have verified that none of the plaintiffs listed in Exhibit A have recovered for their solatium damages previously, nor do they have any other pending motion before this Court for compensation arising out of the September 11th attacks.

6. Accordingly, I respectfully request that this Court grant the proposed order attached hereto as Exhibit B.

Dated: September 12, 2018
New York, NY

/s/ James P. Kreindler
James P. Kreindler